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MEMO ENDORSED, p. 2

July 8, 2021

BY ECF

The Honorable Sidney H. Stein
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Robert Locust, 18 Cr. 289 (SHS)

Dear Judge Stein:

We represent Robert Locust in the above-referenced matter, having been appointed pursuant to the provisions of the Criminal Justice Act ("CJA"), 18 U.S.C. § 3006A. On May 28, 2019, following a three-week trial, Mr. Locust was convicted of one count, conspiracy to commit mail and wire fraud. Mr. Locust was not convicted of any substantive offenses. Completion of sentencing is scheduled for July 9, 2021. Mr. Locust does not consent to proceeding remotely and wishes to appear in person.

The purpose of this letter is to respectfully request a two-month adjournment of Mr. Locust's completion of sentencing based in part on the COVID-19 pandemic and health crisis, and the need for Mr. Locust to continue to receive ongoing and extensive physical therapy and treatment because of injuries he sustained in a car accident. Two additional months will allow Mr. Locust to hopefully complete his needed physical therapy. Lastly, we also note that Mr. Locust's motions for reconsideration of his sentencing and objection to the Government's request for forfeiture and restitution as they pertain to him, are pending. Accordingly, we believe that an adjournment of sentencing is necessary.

We respectfully request an adjournment of sentencing until September, 2021. Based on prior discussions concerning adjournment requests, I believe that the Government opposes.

Thank you for your consideration.

United States v. Robert Locust, 18 Cr. 289 (SHS)

Respectfully submitted,

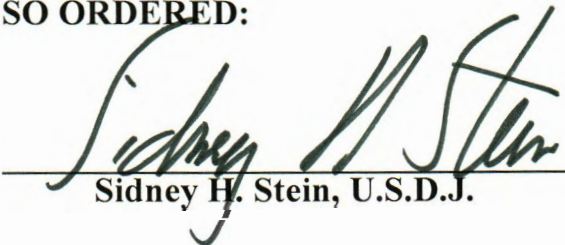
/s/

Anthony Cecutti
Mitchell Dinnerstein

Request for adjournment denied. The completion of this sentencing has been adjourned approximately 10 times, almost always at the request of the defense, since the sentencing procedure was commenced on January 7, 2020. The sentencing will be completed on Friday, July 9, 2021, at 11:00 a.m. in Courtroom 23A at the U.S. Courthouse, 500 Pearl Street, New York, New York, as previously scheduled.

**Dated: New York, New York
July 8, 2021**

SO ORDERED:



Sidney H. Stein, U.S.D.J.